

**ATTACHMENT A**  
**STIPULATION OF FACTS**

*The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.*

In or about May and June 2017, **EDWARD NATHANIEL WALKER (“WALKER”)** acquired fireworks from Business One, which sells fireworks to customers in Indiana and throughout the United States. Business One shipped \$44,739.50 of fireworks to **WALKER**. One shipment was sent to a Maryland location and another shipment was picked up by a driver at the direction of **WALKER** at Business One on June 9, 2017.

During the transactions, **WALKER** provided Business One with three checks for \$7,487.00, \$14,999.70, and \$22,156.80. The total of the checks was \$44,643.50 and all three checks were written on a closed Wells Fargo Bank, N.A. (“Wells Fargo”) business checking account associated with **WALKER** and his business, Eddie’s Fish, Chicken, and Waffles. At the time **WALKER** wrote and sent the checks to Business One, **WALKER** knew the accounts were closed and that Business One would not receive payment.

In order to defraud Business One and acquire the fireworks, **WALKER** had multiple contacts with three Business One representatives. In addition to several phone calls and messages, **WALKER** drafted a letter that was sent to Business One on June 8, 2017, and Business One relied on the representations in the letter prior to releasing the fireworks. The letter was provided to Business One by fax, with a Maryland municipality fax coversheet from the office of a particular elected official.

**WALKER** provided Business One with an address for the business Eddie’s Fish, Chicken, and Waffles in Clinton, Maryland, among other addresses. **WALKER** provided Business One with contact information for himself, including his cell phone number and email address. When Business One attempted to cash the checks from **WALKER**, Business One was notified that the Wells Fargo bank account had been closed. Business One made multiple unsuccessful attempts to contact **WALKER** after the fireworks had been delivered.

On February 13, 2019, in the District of Maryland, law enforcement officers executed a search and seizure warrant at **WALKER**’s residence while **WALKER** was present. During execution of the search warrant, law enforcement seized several items of evidence listed in the search warrant, including several checkbooks for the closed Wells Fargo account associated with the checks that **WALKER** provided to Business One.

In addition, the following were seized during the search: a Glock 33 Gen 4, .357 SIG, bearing serial number BEXT750 (“Glock handgun”); a Marlin, Model 60, .22 Long Rifle, bearing serial number MN68225A (“Marlin rifle”); and approximately ten Hornady .357 SIG pistol cartridges (“ammunition”). The firearms and ammunition were located in an upstairs bedroom


that **WALKER** regularly used. The Glock handgun was located in a dresser which also contained male clothes and two receipts that contained **WALKER**'s name. The ammunition was contained in two Glock handgun magazines, which were located next to the Glock handgun. The Marlin rifle was located in a black rifle case on the floor next to the bed. The Glock handgun and Marlin rifle were both manufactured outside of Maryland and therefore traveled in interstate commerce prior to being recovered in Maryland. **WALKER** knowingly possessed the Glock handgun and Marlin rifle.

Prior to February 13, 2019, **WALKER** had been, and knew that he had been, previously convicted of a crime punishable by imprisonment for a term exceeding one year, and his civil rights had not been restored.

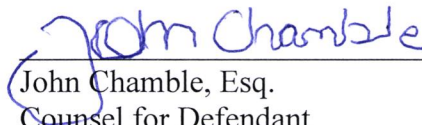
SO STIPULATED:



Dwight J. Draughon  
Thomas P. Windom  
Assistant United States Attorneys



Edward Nathaniel Walker  
Defendant



John Chamble, Esq.  
Counsel for Defendant